Broadcom 5300 California Avenue Irvine, CA 92617 broadcom.com



October 3, 2016

Ex Parte

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Notice of Oral Ex Parte: Current Trends in LTE-U and LAA Technology, ET Docket No. 15-105; and Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49

Dear Ms. Dortch:

On September 29 and 30, 2016, David Recker, Vinko Erceg, and Christopher Szymanski of Broadcom, met separately with Chairman Wheeler's Legal Advisor Edward "Smitty" Smith, Commissioner Rosenworcel's Legal Advisor Johanna Thomas, Commissioner Clyburn's Legal Advisor Daudeline Meme, and Commissioner Pai's Legal Advisor Brendan Carr to discuss the above captioned proceedings.

During these meetings, Mr. Recker, Mr. Erceg, and Mr. Szymanski provided Broadcom's views on the Wi-Fi Alliance LTE-U Coexistence Test Plan. In particular, they explained that Broadcom is concerned about several of the compromises that were made by the Wi-Fi Alliance in order to complete the test plan on time (e.g., removal of instances where the LTE-U interference signal will be stronger than the desired Wi-Fi signal, removal of instances involving signals below -82 dBm). They explained that these changes mean that a variety of scenarios important to consumers will no longer be covered by the test plan. They explained that while the test plan had some significant shortcomings, it represented a reasonable outcome for the multi-stakeholder process as long as it applies to all non-standard unlicensed LTE (i.e., everything other than 3GPP standardized License Assisted Access devices), and all aspects of the test plan are properly executed by Wi-Fi Alliance validated labs to ensure the results actually reflect channel access fairness.

Mr. Recker, Mr. Erceg, and Mr. Szymanski also explained that Broadcom had submitted Wi-Fi prototype devices to OET that can be used in the 5850-5895 MHz frequencies. They explained that to maximize this OET testing opportunity, Broadcom must interoperate its devices with the same DSRC prototypes that were already submitted to the Commission. Without such interoperation there is a chance that the testing could lead to false conclusions, some that could be related to minor software errors typically associated with prototype devices. For this reason, the Commission should consider



allowing all of the participating companies to have access to its labs and the devices that were submitted for this testing.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced docket. If you require any additional information please contact the undersigned.

Sincerely,

/s/ Christopher Szymanski Christopher Szymanski Director, Product Marketing and Government Affairs

cc: meeting participants